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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF DEFENDANT GOOGLE
LLC'S ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion To Consider Whether Another Party’s Material Should be Sealed in
8 connection with Google’s Opposition to Plaintiffs’ Motion for Class Certification.

9 3. Google respectfully requests that the Court seal the portions of Google’s Opposition
10 that contain, reflect, or summarize information Plaintiffs have previously designated as confidential
11 according to the Stipulated Protective Order (Dkt. 81).

12 4. I understand that as the designating party, Plaintiffs will file a declaration
13 establishing that the materials Plaintiffs designated as confidential are sealable.

14
15 I declare under penalty of perjury of the laws of the United States that the foregoing is true
16 and correct. Executed in San Francisco, California on August 5, 2022.

17
18 DATED: August 5, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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21 By /s/ Jonathan Tse
22 Jonathan Tse
23 Attorney for Defendant
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